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16 Attorneys for Defendants
17 SAN FRANCISCO COMMUNITY INVESTMENT FUND,
18 CITY AND COUNTY OF SAN FRANCISCO, and NAOMI KELLY

19
20 UNITED STATES DISTRICT COURT
21
22 NORTHERN DISTRICT OF CALIFORNIA

23
24 UNITED STATES OF AMERICA, *ex rel.*
25 LEIASA BECKHAM, and STATE OF
26 CALIFORNIA, *ex rel.* LEIASA BECKHAM,

27 Plaintiffs,

28 vs.

1850 BRYANT LAND LLC, KASLOFSKY
20 & ASSOCIATES LLC, THURSTON
21 KASLOFSKY, CHRISTOPHER PAUL
22 FOLEY, DOUGLAS ROSS, SAN
23 FRANCISCO COMMUNITY
INVESTMENT FUND, CITY AND
COUNTY OF SAN FRANCISCO, and
NAOMI KELLY,

24 Defendants.

25 Case No. 3:21-cv-05742-RS

26 **STIPULATION AND [PROPOSED] ORDER
27 TO MODIFY CASE SCHEDULE**

1 Pursuant to N.D. Cal. Civ. L.R. 6-2 and 7-12, Plaintiff-Relator Leiasa Beckham (“Plaintiff”)
2 and Defendants 1850 Bryant Land LLC, Christopher Paul Foley, Douglas Ross, Kaslofsky &
3 Associates LLC, Thurston Kaslofsky, San Francisco Community Investment Fund, City and County of
4 San Francisco, and Naomi Kelly (collectively “Defendants”), by and through their undersigned
5 counsel, hereby stipulate as follows:

6 **RECITALS**

7 WHEREAS, on November 16, 2023 the Court issued the Initial Case Management Order
8 setting deadlines in this matter (Dkt. 98); and

9 WHEREAS, Defendants served discovery requests on Plaintiff and third parties in the months
10 following the Initial Case Management Order; and

11 WHEREAS, the Parties engaged in settlement discussions in the summer of 2024 but were
12 unable to reach a resolution; and

13 WHEREAS, Plaintiff’s then counsel filed a motion to withdraw as counsel on October 4, 2024
14 (Dkt. 113); and

15 WHEREAS, on November 15, 2024 the Court granted Plaintiff’s then counsel’s conditional
16 motion to withdraw as counsel (Dkt. 117); and

17 WHEREAS, on December 3, 2024 the Court granted Plaintiff’s current counsel motion to
18 substitute in as counsel (Dkt. 120); and

19 WHEREAS, on January 27, 2025 the Court issued the operative Case Management Scheduling
20 Order which set multiple case deadlines, including the fact discovery cut-off on July 18, 2025 (Dkt.
21 125); and

22 WHEREAS, on June 12, 2025, Plaintiff-Relator Beckham’s counsel served Rule 30(b)(6)
23 deposition notices and Rule 34 requests for production on Defendants in this case; and

24 WHEREAS, despite their diligent efforts, Defendants are unable to fully respond to Plaintiff-
25 Relator Beckham’s discovery requests by the current July 18, 2025 fact discovery cut-off; and

26 WHEREAS, Plaintiff’s counsel has trials scheduled in other matters in late September 2025
27 and in May 2026;

28 THEREFORE, Plaintiff and Defendants stipulate as follows:

1. The Parties have met and conferred and agree that an extension to the schedule will be
 2 necessary to allow sufficient time for ongoing fact discovery and to accommodate Plaintiff's counsel's
 3 upcoming trials in September 2025 and May 2026.

4. 2. The Parties have met and conferred and have agreed to the following revisions to the
 5 case schedule:

Event	Current Schedule	Proposed Revised Schedule
Close of Fact Discovery	July 18, 2025	August 29, 2025
Expert Disclosures	August 15, 2025	November 7, 2025
Rebuttal Expert Disclosures	September 12, 2025	November 26, 2025
Close of Expert Discovery	October 3, 2025	December 19, 2025
Deadline for Summary Judgment Motions	September 25, 2025 <i>(N.D. Cal. L.R. 7-2)</i>	February 6, 2026
Deadline for Summary Judgment Opposition	October 9, 2025 <i>(N.D. Cal. L.R. 7-3)</i>	February 27, 2026
Deadline for Summary Judgment Replies	October 16, 2025 <i>(N.D. Cal. L.R. 7-3)</i>	March 20, 2026
Summary Judgment Motion Hearing	October 30, 2025	April 9, 2026
Pretrial Conference	January 7, 2026	June 22, 2026
Trial	January 20, 2026	July 27, 2026

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23 ///

24 ///

1 **SO STIPULATED:**

2 Dated: July 10, 2025

DAVID CHIU
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THOMAS S. LAKRITZ
MIGUEL A. GRADILLA
KARUN TILAK
MOLLY J. ALARCON
Deputy City Attorneys

3 By: /s/ Karun Tilak

4 KARUN TILAK

5
6 Attorneys for Defendants SAN FRANCISCO
7 COMMUNITY INVESTMENT FUND, CITY AND
8 COUNTY OF SAN FRANCISCO, and NAOMI KELLY

9 Dated: July 10, 2025

10 SEVERSON & WERSON

11 By: /s/ Andrew S. Elliott

12 ANDREW S. ELLIOTT
13 ELIZABETH C. FARRELL

14 Attorneys for Defendants 1850 BRYANT LAND LLC,
15 CHRISTOPHER PAUL FOLEY AND DOUGLAS
16 ROSS

17 Dated: July 10, 2025

18 JACKSON LAW GROUP, P.C.

19 By: /s/ Aaron R. Jackson

20 AARON R. JACKSON

21 Attorneys for Defendants KASLOFSKY &
22 ASSOCIATES LLC and THURSTON KASLOFSKY

23 Dated: July 10, 2025

24 FRUCHT & GEONETTA LLP

25 By: /s/ Kenneth Frucht

26 KENNETH FRUCHT
27 FREDERICK J. GEONETTA

28 Attorneys for Plaintiff LEIASA BECKHAM

29 **IT IS SO ORDERED.**

30 DATED: _____

31 HON. RICHARD SEEBORG
32 Judge, United States District Court

CIVIL L.R. 5-1(h)(3) ATTESTATION

I, Karun Tilak, attest that each of the other signatories have concurred in the filing of this document, which shall serve in lieu of their own signatures on the document.

Dated: July 10, 2025

DAVID CHIU
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By: /s/ Karun Tilak
KARUN TILAK

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